

Exhibit C

13:29:38

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

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MOOG INC.,) 22-CV-187
Plaintiff)
vs.
SKYRYSE, INC., et al) Buffalo, New York
Defendant.) July 27, 2022
1:00 p.m.
- - - - - X

ORAL ARGUMENT
Proceeding held via Zoom for Government Platform
All parties appeared remotely.

TRANSCRIPT OF PROCEEDINGS
BEFORE THE HONORABLE JEREMIAH J. MCCARTHY
UNITED STATES MAGISTRATE JUDGE

FOR PLAINTIFF: SHEPPHARD MULLIN RICHETER & HAMPTON, LLP
BY: RENA ANDOH, ESQ.
LAI YIP, ESQ.
KAZIM A. NAQVI, ESQ.
-and-
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BY: ROBERT J. FLUSKEY, JR, ESQ.
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FOR DEFENDANT: LATHAM & WATKINS, LLP
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MOOG, INC. VS. SKYRYSE, INC. ET AL

Now, turning to my July 22nd decision, I hope I was self explanatory. I'm sure, knowing you all, that there will be some discussion as to what I intended, but here is what I do intend. I recognize that everybody is interested in moving this case along as quickly as possible, as am I, but I think it has to be moved along in a manner that is as efficient as possible, recognizing considerations of proportionality and so forth. And for that reason, I think, as I said in my decision, that I'm going to sequence discovery. And I want to focus, first and foremost, on Moog's identification in a considerable level of detail, as I discussed in my decision, of the trade secrets which it considers to be at issue for purposes of the preliminary injunction hearing. Once those are identified, then the parties can proceed to drill down further both in terms of their research as to whether a particular item claimed to be a trade secret is, perhaps, known elsewhere or whether it has been properly protected as a trade secret, but unless and until we get to that identification, I don't see the point in proceeding on other discovery. And I recognize that this may cause some further delay, but I think that is unavoidable under the circumstances. And I reread the transcript of

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13:50:25 2 be. I mean, for example, Ms. Andoh did say at, you
13:50:28 3 know, at the July 15th proceeding, that you're dealing
13:50:32 4 with potentially a huge number of trade secrets in this
13:50:35 5 case. I think she mentioned the figure of a million.
13:50:42 6 But, obviously, nobody is going to go to Judge Vilardo
13:50:46 7 on a preliminary injunction hearing with a million trade
13:50:50 8 secrets. You can do that, but I can predict your
13:50:53 9 reception would not be overly favorable. So, they are
13:50:57 10 going to have to be culled down in some fashion into a,
13:51:03 11 you know, a coherent presentation to Judge Vilardo.
13:51:08 12 But, again, my hope is that when that time comes for
13:51:12 13 Moog to identify the trade secrets on which it will seek
13:51:17 14 relief at the preliminary injunction hearing, that it
13:51:21 15 will be, you know a reasonably narrow scope. So, I
13:51:26 16 guess I'll throw it back to counsel for Moog and Skyryse
13:51:33 17 just to react to Mr. Green's suggestion about what will
13:51:40 18 doubtless be incorporated in a letter that he is going
13:51:45 19 to be submitting, either a complete or partial stay.
13:51:49 20 Anybody want to react to that?

13:51:52 21 MR. LUMISH: Maybe I should go first.

13:51:53 22 MAGISTRATE JUDGE MCCARTHY: Excuse me, Mr.
13:51:54 23 Lumish, somebody just said before. Mr. Green?

13:51:58 24 MR. GREEN: Yes, your Honor.

13:51:59 25 MAGISTRATE JUDGE MCCARTHY: Back to Mr.